

3. impose penalties on BellSouth, as provided in O.C.G.A. § 46-2-91, for violations of S.B. 137 and orders of the Commission;
4. include a discussion of this complaint in its annual report to the General Assembly, as required by O.C.G.A. § 46-5-174, on the status of the transition to alternative regulation of telecommunications services in Georgia;
5. adopt interim or permanent rules for unbundled loop provisioning, including civil penalties;
6. require BellSouth to report its current provisioning intervals for BellSouth customers and to demonstrate that competitive services are provided in parity with services provided to BellSouth customers;
7. require BellSouth to file periodic reports detailing its actual performance in providing services to CLECs;
8. require BellSouth to notify the CLEC prior to performing work on facilities serving the CLEC's customer's lines;
9. require BellSouth to establish expedite and escalate procedures for loop order processing;
10. provide for a Staff Ombudsman or Administrative Law Judge to facilitate informal mediation of CLEC disputes; and
11. issue any other relief that the Commission deems meet and proper.

This 9th day of July, 1997.

Respectfully submitted,

L. Craig Dowdy by WER
L. Craig Dowdy



William E. Rice

For LONG ALDRIDGE NORMAN LLP
One Peachtree Center
303 Peachtree Street, N.E., Suite 5300
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131 National Business Parkway, Suite 100
Annapolis Junction, Maryland 20701
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Attorneys for American Communication
Services Of Columbus, Inc.

CERTIFICATE OF SERVICE


I certify that I have this day served a copy of the foregoing Complaint by American Communication Services, Inc. in Docket No. 7818-U upon the following persons by causing copies of the same to be placed in an envelope with adequate postage affixed thereon and deposited in the United States Mail addressed as follows:

Helen O'Leary
Assistant Attorney General
Counsel for the Commission Advisory Staff
40 Capitol Square, Suite 132
Atlanta, Georgia 30334

Jim Hurt, Director
Consumers' Utility Counsel
Office of Consumer Affairs
2 Martin Luther King Drive
Plaza Level East, Suite 356
Atlanta, Georgia 30334

Fred McCallum, Jr.
BellSouth Telecommunications, Inc.
Room 376
125 Perimeter Center West
Atlanta, Georgia 30346

This 9th day of July, 1997.


William E. Rice

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C. Order Processing

- C.1 ACSI shall place orders for unbundled loops (and other network elements) through completion and submission of the Service Order form specified in the FBOG. The installation time intervals which shall apply thereto are as expressed in subsection IV.D hereafter.
- C.2 Order processing for unbundled loops shall be mechanized, in a form substantially similar to that currently used for the ordering of special access services. Automated interfaces shall be provided into a centralized operations support systems database for determining service availability on loops (e.g., ISCON), confirmation of order acceptance and ongoing order status. If made available by BellSouth to any other telecommunications carrier, automated interfaces shall be provided in a centralized operations support systems database for installation scheduling, confirmation of circuit assignments and completion confirmation.
- C.3 Particular combinations of elements, hereafter referred to as combinations, identified and described by ACSI can be ordered and provisioned as combinations, and not require the enumeration of each element within that combination in each provisioning order, consistent with OBF or other mutually agreed upon procedures.
- C.4 Appropriate ordering/provisioning codes will be established for each identified combination, consistent with OBF or other mutually agreed upon procedures.
- C.5 When combinations are ordered where the elements are currently interconnected and functional, those elements will remain interconnected and functional (except for the integrated SLC).
- C.6 When the open network access platform is available, BellSouth will provide ACSI with the ability to have the BellSouth end office AIN triggers initiated via an appropriate service order from ACSI.
- C.7 ACSI and BellSouth will negotiate in good faith to create a mutually acceptable standard service order/disconnect order format, consistent with OBF or other mutually agreed upon procedures.
- C.8 BellSouth shall exercise best efforts to provide ACSI with the "real time" ability to schedule installation appointments with the customer on-line and access to BellSouth's schedule availability beginning in the second calendar quarter of 1997. In the interim, BellSouth will install unbundled loops and other network elements by the Customer Desired Due Date (CDDD) where facilities permit.

C.9 When available to any other telecommunications carrier or other customer, BellSouth shall provide "real time" response for firm order confirmation, due date availability/scheduling, dispatch required or not, identify line option availability by Local Service Office (LSO) (such as digital copper, copper analog, ISDN), completion with all service order and time and cost related fees, rejections/errors on service order data element(s), jeopardies against the due date, missed appointments, additional order charges (construction charges), order status, validate street address detail, and electronic notification of the local line options that were provisioned. This applies to all types of service orders and all network elements.

C.10 The Parties will negotiate in good faith to establish expedite and escalation procedures for ordering and provisioning, including establishment of a process for ACSI to request the expedite an order on a customer's behalf.

D. Conversion of Exchange Service to Network Elements

D.1 Installation intervals must be established to ensure that service can be established via unbundled loops in an equivalent timeframe as BellSouth provides services to its own customers, as measured from the date upon which BellSouth receives the order to the date of customer delivery.

D.2 On each unbundled network element order in a wire center, ACSI and BellSouth will agree on a cutover time at least 48 hours before that cutover time. The cutover time will be defined as a 30-minute window within which both the ACSI and BellSouth personnel will make telephone contact to complete the cutover.

D.3 Within the appointed 30-minute cutover time, the ACSI contact will call the BellSouth contact designated to perform cross-connection work and when the BellSouth contact is reached in that interval, such work will be promptly performed.

D.4 If the ACSI contact fails to call or is not ready within the appointed interval and if ACSI has not called to reschedule the work at least two (2) hours prior to the start of the interval, BellSouth and ACSI will reschedule the work order.

D.5 If the BellSouth contact is not available or not ready at any time during the 30-minute interval, ACSI and BellSouth will reschedule and BellSouth will waive the non-recurring charge for the unbundled elements scheduled for that interval.

- D.6 The standard time expected from disconnection of a live Exchange Service to the connection of the unbundled element to the ACSI collocation arrangement is 5 minutes. If BellSouth causes an Exchange Service to be out of service due solely to its failure for more than 15 minutes, BellSouth will waive the non-recurring charge for that unbundled element.
- D.7 If unusual or unexpected circumstances prolong or extend the time required to accomplish the coordinated cut-over, the Party responsible for such circumstances is responsible for the reasonable labor charges of the other Party. Delays caused by the customer are the responsibility of ACSI.
- D.8 If ACSI has ordered Service Provider Number Portability (SPNP) as part of an unbundled loop installation, BellSouth will coordinate implementation of SPNP with the loop installation.
- D.9 The conversion/installation time intervals which shall apply to unbundled loops and other network elements shall be as expressed herein.

E. Service Quality

- E.1 At a minimum, the service quality of leased network elements should match that of BellSouth's own elements and conform to all Bellcore and ANSI requirements applicable to the type of service being provided. In addition, BellSouth will provide maintenance services on network elements purchased by ACSI which are timely, consistent and at parity with that provided when such elements are used for its own purposes.
- E.2 Maintenance support shall be available 7 days a week, 24 hours a day. Provisioning support shall be available at the same times at which BellSouth installs its own bundled local exchange services.
- E.3 Installation and service intervals shall be the same as when BellSouth provisions such network elements for use by itself, its affiliates or its own retail customers.
- E.4 In facility and power outage situations, BellSouth agrees to provide network elements leased by ACSI the same priority for maintenance and restoration as similar elements used by BellSouth for itself or its affiliates.
- E.5 The Parties agree that all interconnection arrangements and services will at a minimum be subject to technical standards which are equal to those that BellSouth affords to itself, other LECs or other telecommunications carriers. This must, at a minimum, include parity in:

- Port features
- Treatment during overflow/congestion conditions
- Equipment/interface protection
- Power redundancy
- Sufficient spare facilities to ensure provisioning, repair, performance and availability
- Mediation functions
- Standard interfaces
- Real time control over switch traffic parameters
- Real time access to integrated test functionality
- Real time access to performance monitoring and alarm data

E. Network Information Exchange

- F.1 BellSouth shall provide ACSI with information sufficient to determine an end user's existing service and feature configurations.
- F.2 BellSouth agrees to provide ACSI with all necessary engineering information regarding all unbundled network elements and combinations thereof, including information normally provided on records such as the detailed design layout records (DLR) for unbundled loops and circuits.
- F.3 BellSouth shall provide information to ACSI on a continuing basis required to keep ACSI apprised of engineering changes associated with BellSouth's network elements and its deployment of new technologies.
- F.4 BellSouth shall provide ACSI with a detailed description of the criteria and procedures used for handling facility and power outages.
- F.5 Where permitted by law, BellSouth will make available to ACSI electronic (magnetic tape and/or diskette) and hard copies of its Master Street Address Guide (MSAG), and any regular updates thereof.
- F.6 BellSouth will provide ACSI with access to a listing and description of all services and features available down to street address detail, including: Type of Class 5 switch by CLLI, line features availability by LSO, and service availability by LSO, as well as the data elements required by BellSouth to provision all such services and features.

G. Maintenance and Trouble Resolution

- G.1 BellSouth shall provide automated interfaces to ACSI for field dispatch scheduling, status of repairs and confirmation of repair completion. The mean time to repair unbundled loops shall be equivalent to the mean time to repair reported by BellSouth for its retail customers.

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**ANALYSIS CONDUCTED FOR
BELLSOUTH - LCSC
ATLANTA, GA - BIRMINGHAM, AL
MARCH 3, 1997 - MARCH 13, 1997**

002767

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002768

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NO. 955 P828/860



DEWOLFF, BOBERG & ASSOCIATES, INC.

Resources to management for improving performance

P.O. Box 21989 • Charleston, South Carolina 29413-1989 • (800) 800-4030

Mr. Edward A. English
Senior Director - Interconnection Services
BellSouth Telecommunications
675 West Peachtree Street
Atlanta, GA 30375

March 13, 1997

Dear Mr. English:

Thank you for the opportunity you provided us to analyze the BellSouth LCSC operations in Atlanta, GA and Birmingham, AL. Our objective was to determine whether we could make a worthwhile application of our systems and training installations, designed to reduce costs while improving manager, supervisor and employee effectiveness.

We realize that many of the thoughts we express may have been previously considered by your management group. Your ideas, combined with ours and developed through full participation during the course of the program, will assure maximum results. We consider our ability to install our proposals, achieving predictable and measurable results, to be the most important factor in our usefulness to you.

In our presentations, we have not taken time praising the many good points we have seen, because only by facing the weaknesses, and correcting them, can valuable results be obtained. Our program will consist of working with your people to correct the weaknesses we have outlined. Naturally, our preliminary analysis can only outline areas inviting more detailed study in the application of the principles we propose.

Although we feel there will be enormous productivity and service level gains from the implementation of our management operating system and employee skills training programs, we are not able to put a financial value on them because of the lack of a historical base to measure against. We will, however, measure and track the actual levels of productivity and service to ensure that acceptable levels are achieved.

Please note that we are not attempting to put a financial value on the many collateral benefits that will come about as a result of this program, such as stronger teamwork, quality and service awareness, and ongoing improvements made by your people using this process.

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NO. 935 P821/060

Mr. English
March 13, 1997

The total cost for the development, training and installation of this program is Seven Hundred Ninety Two Thousand Dollars (\$792,000). We anticipate spending 22 consecutive calendar weeks on your premises, invoicing you Thirty Six Thousand Dollars (\$36,000) per week. All invoices are payable weekly as invoiced. You may discontinue this program at any point and will only be charged for time spent to date.

In the eighteenth week of our program, we will be prepared to discuss the need for transition with our Continuous Improvement Services Group. The purpose of this service is to provide a limited, on-going, follow-up with your people to ensure that the performance improvements are maximized and do not deteriorate over time. The extent and cost for this optional service will be determined at this time.

So that we may use staff members already familiar with your operations and this proposal, we would appreciate your authorization to proceed today. If we are able to start this program on Monday, March 17, 1997, we would plan on using the chief and selected staff from our analysis to provide continuity. We look forward to working with you and your people, and are convinced you will find it a rewarding experience.

Sincerely yours,

DEWOLFF, BOBERG & ASSOCIATES, INC.


Paul J. O. Buehner


James LaRue

SUMMARY OF ANALYSIS FINDINGS

OVERVIEW

This analysis was conducted for the LCSG operations in both Atlanta and Birmingham from March 3, 1997 to March 13, 1997. The purpose was to identify and quantify any opportunities that might exist to improve the operations as your volume and manpower ramp up to meet the forecasted volume. Our purpose was also to develop an approach that identified those opportunities which was consistent with your vision for the LCSG operation at BellSouth.

We worked with managers and supervisors in their area. The receptivity of your management group and employees was excellent as they shared with us their process flow problems, training deficiencies and frustrations. We conducted behavioral analyses to determine how supervisors utilized their time, supported their people, and we identified the consequences of their management style. We performed a diagnostic assessment of your management organization to determine their attitudes concerning the roles and responsibilities of effective supervision. Our evaluation of your management operating systems was conducted by first determining the effectiveness of the system elements that exist, and second, by evaluating how well they are being utilized by management to crew the operation and resolve operating problems. We determined the current level of labor productivity and the root causes of many problems which diminish productivity. Employee skills analyses were conducted to identify training needs, the degree of flexibility, and management participation in organizational development. We also studied your employee training process by reviewing the systems and training techniques currently in use. We conducted detailed process mapping of two major products, on unbundled and a consolidated resale order. This analysis of sample work processes defined the predictability of process compliance, procedures, practices, and the impact these have on productivity, service lead times and quality.

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1. We conducted behavioral studies with all of your supervisors, spending a day working with them in their department. We concluded that supervisors spend very little time guiding, coaching, or training their people. They also have very limited control over the work flows and processes. We determined that most of their contact with their people was initiated by the employees and was generally spent in a reactive "fire fighting" mode. We did not observe any supervisor spending time training their employees or recognizing a job well done. We noted a direct correlation between the passive behaviors of the supervisors and the attitudes which we determined through our diagnostic questionnaire. The majority of their time is spent on administrative activities, from which we saw little added value, or was idle / available.
2. Our diagnostic assessment indicates that your supervisory level has a poor understanding of the concepts of proactive supervision, organizational development, and systems utilization. We believe this passive management style is a result of a lack of an effective management operating system in LCSC which would support their efforts to resolve operating problems and address training needs. We also noted the absence of management training programs which provide them with the skill sets necessary to function effectively in a start up operation such as LCSC.
3. Your LCSC management systems contain fragments of most of the basic elements required to control an order entry operation. However, although many of the elements exist, they will require significant upgrades to make them effective management tools. Those elements which could be effective such as assignment controls are not being used by management to identify root causes of productivity, quality and service problems. There are significant opportunities to improve the utilization of your systems by training management on how to identify process breakdowns, causes of rework, training needs and to provide employee feedback.

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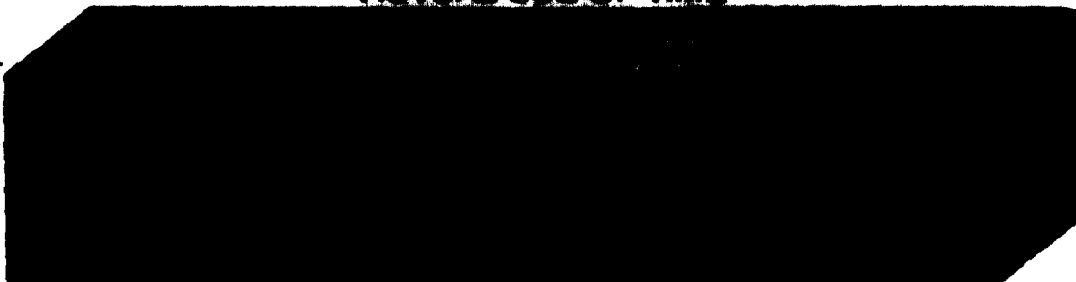
4. The productivity studies which were conducted with your service representatives indicate that there was a significant opportunity to improve your effective use of labor. This level of ineffective utilization is a result of unclear expectations, employee skills deficiencies, the lack of process documentation and control over the work flow. These problems are unnecessarily inflating your operating cost and limiting your ability to deliver a consistently high level of customer service. Excessive errors and rework are lowering the quality of your service due to missed dates and excessive lead times. The root causes of these problems continue without supervision identifying the problems or developing corrective action strategies.
5. Your employees are not effectively trained to maximize their skills and productivity. These training deficiencies are having a negative impact on both service and quality. We noted that employees must rely upon fellow employees to resolve training needs without the direction or participation of the supervisors. This is limiting productivity as employees are constantly interrupting fellow workers to get help and direction. Many of your key jobs have insufficiently trained people to assure that employees can be assigned to meet volume requirements. This situation is especially acute as you look forward toward your anticipated ramp up of operations at the LCSC. The lack of supervisory participation is reflected in their poor attitude toward the subtasks of employee development as noted in our diagnostics.
6. Our evaluation of your basic work processes in both resale and unbundled, indicated they lack process documentation, compliance, and the accuracy to provide a predictable, high quality output. We repeatedly observed employee skills deficiency and errors which is negatively impacting both productivity and quality. Your current level of quality is unnecessarily low. Due to numerous operating problems, training deficiencies and process non-compliance, this level of quality is inflating your operating costs per order, and contributing to delays in customer service. The current level of errors is alarming due to the low volume level and the fact that current employees whom we studied have been on their current jobs from four months to a year. These quality problems and errors are recurring several times per day without supervisory awareness or corrective action.

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**BELLSOUTH LCSC
ATLANTA - BIRMINGHAM
SUPERVISORY USE OF TIME**

PERCENT	DESCRIPTION
	SUPERVISING
	PROBLEM SOLVING
	ADMINISTRATIVE
	EMPLOYEE WORK
	IDLE / AVAILABLE

ACTUAL USE OF TIME



PERCEIVED ACTUAL USE OF TIME



PERCEIVED IDEAL USE OF TIME



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SPECIFIC POINTS

1. Supervisors do not use their time to direct, coach or train their people. Their basic management style is passive or reactionary and they tend to deal only with the symptoms of recurring problems. When an employee does bring problems to their attention, supervisors often simply take the problem over upon themselves to solve and do not train. Our observation of supervisory behavior identified the following results.

- Only 12% of their available time is spent in any type of supervisory interaction with their people. The range of time spent in supervisory interaction with their people was from 2 to 22%. The time that we did observe supervising was typically a reassignment of one person's work to a fellow employee, due to training deficiencies, given to an employee without communicating any performance expectations. We did not see any supervisor actively train an employee, this corresponds to their attitude that they are not responsible for the development of their people. We saw no evidence of any supervisors attempting to reinforce/acknowledge high performance or motivating their people. This passive management style often results in the employees lacking direction and clear expectations, resulting in poor productivity, quality, and excessive lead-times which negatively impacts your levels of service.

37% of their time is spent responding to quality/operating problems or emergencies that are usually brought to their attention by their employees. This problem solving activity was either always reactive, or responding to well established problems. We observed little time devoted to preemptive action to keep problems from occurring or recurring. This "fire fighting" technique results in an approach to problem solving where supervisors address only the symptoms of the problem. We also noted that in the BellSouth culture, the supervisors often take orders which have problems into their office and solve them. They do not train their people. As a result, your problems tend to be recurring. We noted examples where this activity consumed from 14% to 40% of a supervisors' day.

38% of their time is spent in administrative functions such as meetings, phone calls, reports or other paperwork which provide little or no added value. Little of this time is spent in planning or analyzing the available data which would cause them to take action. This results in continued process flow problems caused by the lack of action taken to correct the problems in work processes. Reporting variances to plan should be used as a management tool to focus resources on solving root causes of problems. This process was not evident in our supervisory studies. We noted that in the situations where the supervisors spent as little as 31% of their time in administrative activities, the amount of time spent in supervisory interaction with their people ranged from 2% to 22%. This tends to indicate an avoidance management style since even when time was available for direct supervisory interaction with their people they avoided their people.

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13% of their time is idle or available for other more productive activities. This indicates the supervisors have the time available to take a proactive approach to managing their areas of responsibility. This excessive idle time results in lower employee productivity and quality due to the lack of direct interaction with the employees. A couple of your supervisors spent a third of their time in this activity. In these situations, the amount of time spent in a supervisory interaction with their people was still minimal. The key points are the lack of identifying recurring operating problems, the lack of control over the process flow and the lack of support to their service representatives.

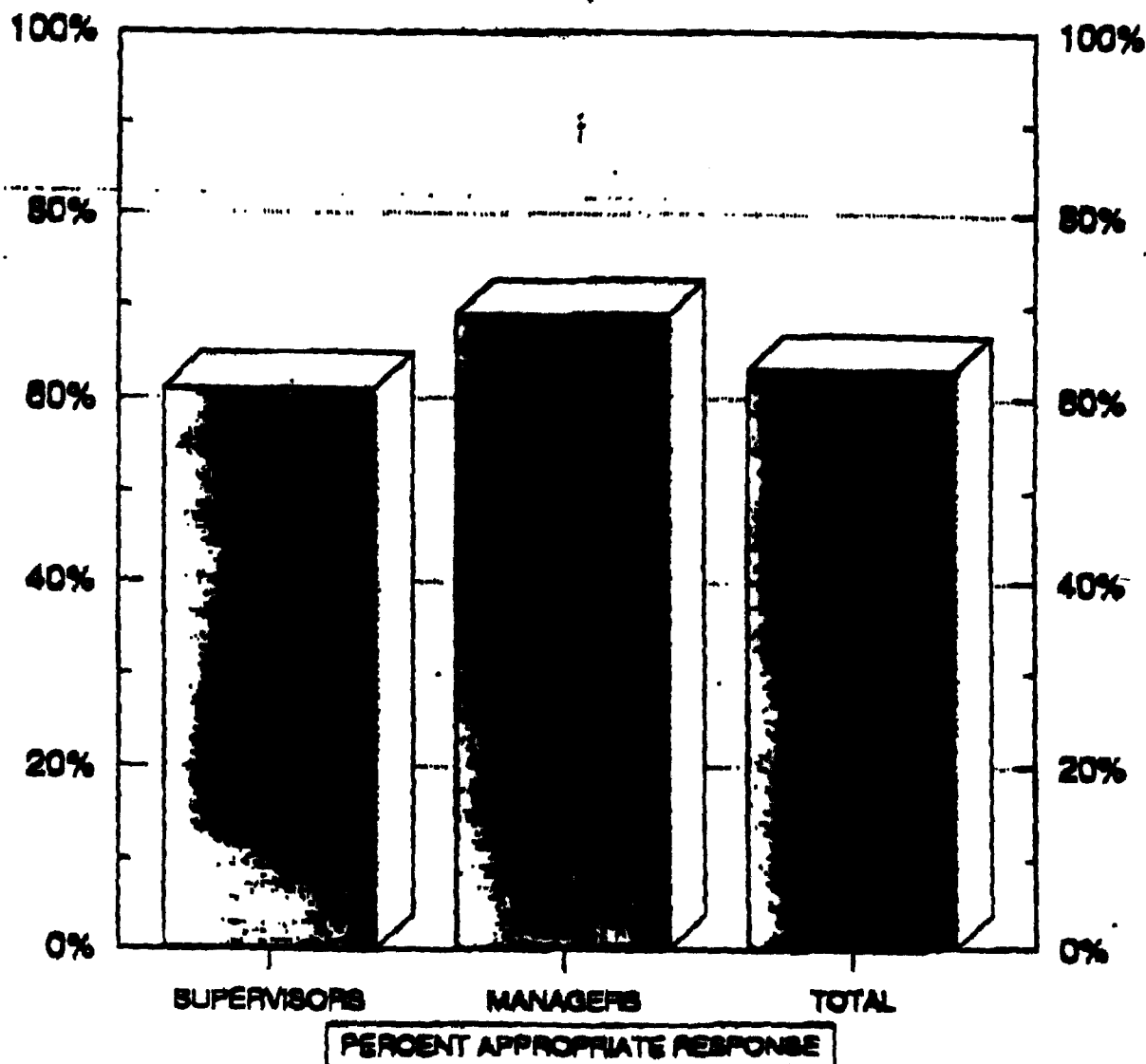
Your supervisors perceive that they currently spend 35% of their time in supervisory functions and that ideally they would like to spend 35% of their time supervising. This perception is encouraging from the standpoint that they recognize they should be spending more time directing their people, but it is discouraging when compared to their actual time spent in any supervisory function (12%). They are doing what they believe they should be doing and the real problem is the lack of clarity in roles / responsibilities, poor skill sets and unclear expectations as to what they should be doing.

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BELLSOUTH - LCSL ATLANTA - BIRMINGHAM DIAGNOSTIC ASSESSMENT OF SUPERVISORY SKILLS OVERALL SCORES

■ SATISFACTORY	70% to 100%
□ MARGINAL	60% to 69%
■ UNSATISFACTORY	0% to 59%



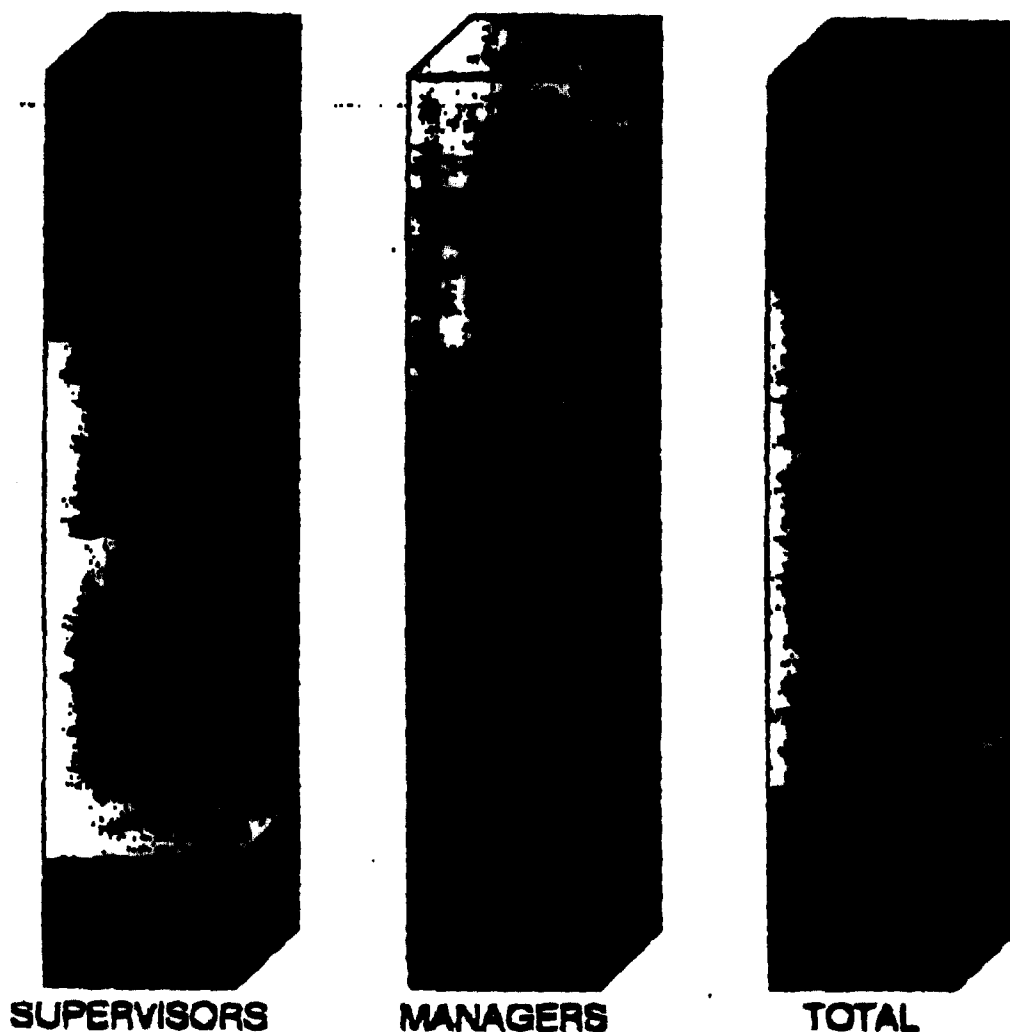
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**BELLSOUTH - LCSC
ATLANTA - BIRMINGHAM
SUPERVISORY SKILLS ASSESSMENT
POPULATION DISTRIBUTION**

	SATISFACTORY	70% to 100%
	MARGINAL	60% to 69%
	UNSATISFACTORY	0% to 59%



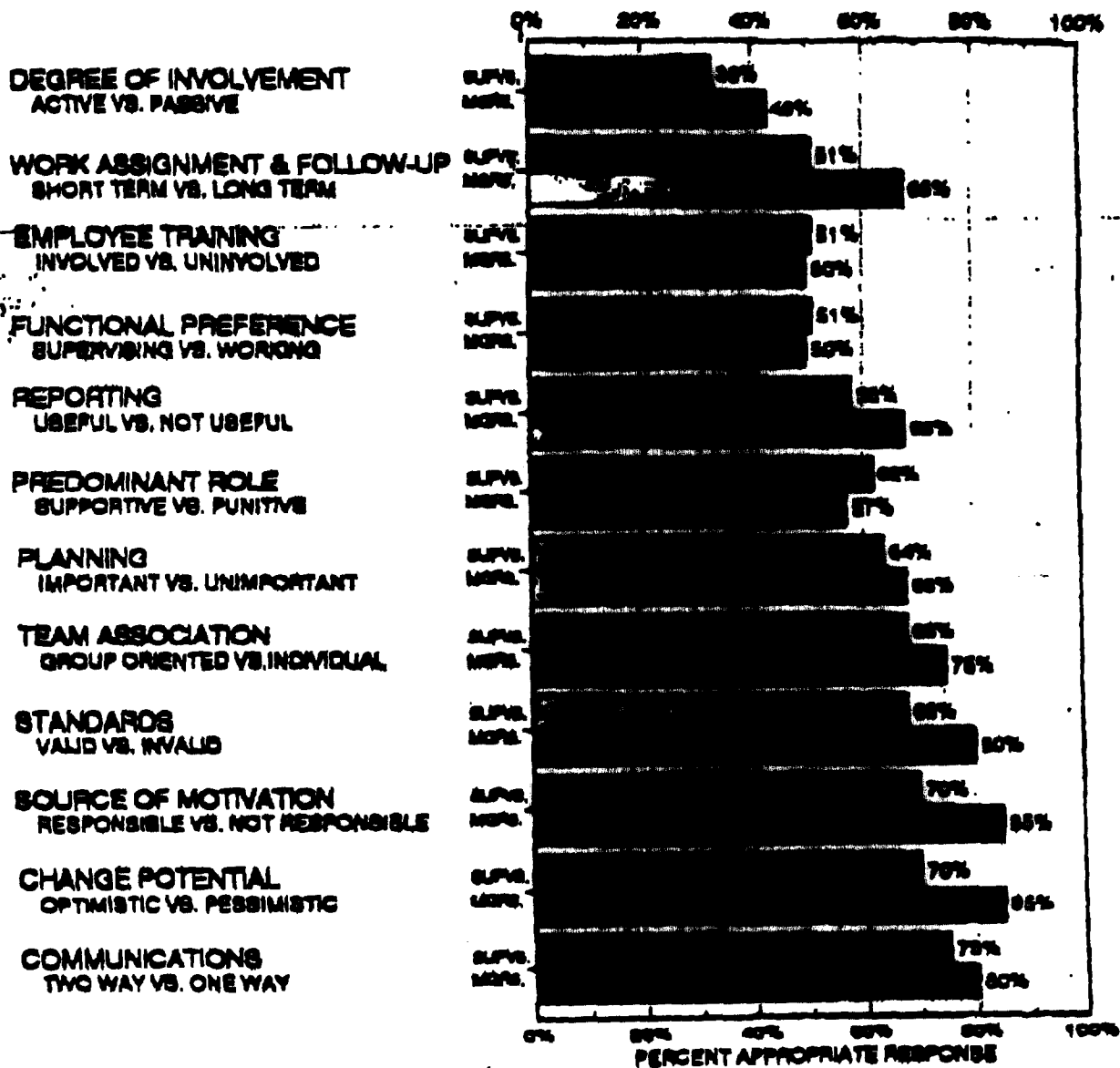
SUPERVISORS

MANAGERS

TOTAL

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BELLSOUTH - LCSC ATLANTA - BIRMINGHAM SUPERVISORY SKILLS ASSESSMENT BY SUBSCALE



2. Diagnostic assessment indicates that your supervisors have a poor understanding of the concepts of effective supervision. Their overall score of 51% is well below the 70% minimum for an acceptable level of understanding. The fact that on several subscales the managers' scores are not significantly higher than the supervisors' indicates a lack of positive role modeling. The poor attitudes in the areas of work flow control, employee development and systems is reflected in the passive management attitude we noted in our supervisory studies. Some specific areas of weakness include:

DEGREE OF INVOLVEMENT - The managers' score of 43%, and the supervisors' score of 33%, indicate a very passive style of supervision with minimal involvement with their people. This correlates with the small amount of time we observed them actually spending in supervisory functions. (12%) When employees did bring problem orders to their supervisors they typically reacted by either giving the problem to another employee or by solving the problems themselves. In either situation, the employees did not receive feedback or training.

WORK ASSIGNMENT & FOLLOW-UP - The supervisors' score of 51%, indicate that they generally believe in giving long term assignments with vague expectations, and providing follow-up on an infrequent basis. This attitude is consistent with the behaviors we observed in our studies, as we did not observe any of the supervisors assign work by communication expectations relative to quality or productivity. We also did not see supervision involved in systematic follow up or monitoring of work in progress. These situations do not permit the timely resolution of problems.

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EMPLOYEE TRAINING - The managers' score of 50%, and the supervisors' score of 51% indicate they do not accept the responsibility for training employees, and do not feel they need to participate in their development. They believe that employee development is some one else's responsibility, such as BellSouth corporate staff function. They also prefer to let an employee learn from another employee, failing to recognize that the skills required to perform an activity are different from those required to teach that activity. This perception and practice results in the continuation of "bad" habits and ineffective methods, instead of properly training the employees and providing them with the support they deserve. The fact that the Managers' score is lower than the supervisors indicates that there is a lack of positive role modeling.

FUNCTIONAL PREFERENCE - The managers' score of 50% and the supervisors' score of 51%, indicate they are more comfortable in doing the work themselves, than in directing their people. This coincides with our studies, in which observed the supervisors frequently solving problem orders by taking the order themselves to respond to the problem without training their people. The fact that the managers' score is lower than the supervisors again points to the lack of proper role modeling to solve this problem of management role and responsibilities. It also indicates that the entire management structure tends to function at a level lower than their title would indicate.

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